

# Exhibit 14

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*Palace Skateboards Limited and GSLT Holdings Limited and*  
*RVRG Holdings LLC*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DENIM TEARS, LLC, KING SPIDER LLC, LOEWE,  
S.A., OFF-WHITE LLC, PALACE SKATEBOARDS  
LIMITED, GSLT HOLDINGS LIMITED, and RVRG  
HOLDINGS LLC,

*Plaintiffs*

v.

PANDA (HONG KONG) TECHNOLOGY CO., LTD.  
d/b/a PANDABUY,

*Defendant*

**CIVIL ACTION No.: 24-cv-2668  
(JGLC)**

**AMENDED COMPLAINT**

**Jury Trial Requested**

Spider Marks, or use the Spider Marks in connection with goods or services or otherwise, without the express permission of King Spider.

### **Defendant PandaBuy's Wrongful and Infringing Conduct**

96. PandaBuy is an online shopping platform that aids consumers wishing to purchase goods on popular Chinese ecommerce platforms such as Taobao and 1688 which are notably directed towards businesses and consumers based in China and do not ship products directly to the U.S. PandaBuy specifically targets U.S. consumers by translating Merchant Storefronts on Taobao and 1688 from Chinese to English to enable U.S. consumers to shop on these platforms.<sup>2</sup> Consumers without access to Merchant Storefronts on Taobao and 1688, search for and identify items they wish to purchase via the translated listings on PandaBuy, and PandaBuy then purchases the product and directs shipment to its warehouses in China. Once PandaBuy receives the shipments, it unpackages, photographs and sends the photographs to the end consumer for review and approval. Upon approval and receipt of shipping instructions from the consumer, PandaBuy repackages the product(s) and ships the product(s) to the consumers located in the U.S., including New York.<sup>3</sup>

97. PandaBuy has promoted, endorsed, encouraged and assisted in the sale and transfer of counterfeit goods across the globe garnering over 17 million visits in January 2024 alone.<sup>4</sup>

98. Through PandaBuy, consumers are offered notoriously low prices as compared to other e-commerce platforms.<sup>5</sup> Despite the low prices, PandaBuy guarantees its consumers “top-notch quality control and customer service.”<sup>6</sup>

<sup>2</sup> Louise Matsakis, *The Influencers Getting Paid to Promote Designer Knockoffs from China*, WIRED (Mar. 10, 2024), <https://www.wired.com/story/influencers-paid-promote-designer-knockoffs-from-china/>.

<sup>3</sup> *About Us*, PANDABUY, <https://www.pandabuy.com/about/abcenter> (last visited Mar. 08, 2023); see *FAQs*, PANDABUY, <https://www.pandabuy.com/help/hpcenter> (last visited Mar. 08, 2023).

<sup>4</sup> See *Aqsa Younas Rana*, Pandabuy: The Counterfeit Fashion Hub Catering to Generation Z, BNN (Dec. 06, 2023), <https://bnnbreaking.com/finance-nav/business/pandabuy-the-counterfeit-fashion-hub-catering-to-generation-z/>.

<sup>5</sup> Farhana Hasnin, *Unlocking the Secrets of PandaBuy*, LINKEDIN (Oct. 07, 2023), <https://www.linkedin.com/pulse/unlocking-secrets-pandabuy-farhana-hasnin>.

<sup>6</sup> *Id.*